



WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

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February 4, 2009

Dennis Quilliam
City Planner
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Dear Mr. Quilliam:

COUNTY OF LOS ANGELES COMMENTS REGARDING LAX TOM BRADLEY INTERNATIONAL TERMINAL RECONFIGURATION PROJECT

The County of Los Angeles (County) has reviewed the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration Project. Consistent with the California Environmental Quality Act (CEQA), our comments on the TBIT Reconfiguration Project are presented below.

1. **Use of LAX Master Plan Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS):** The proposed EIR scope of analysis presumes that the long-term impacts of project implementation have been satisfactorily analyzed in the previous Master Plan EIR. The County has consistently noted the LAX Master Plan Final EIR/EIS is fundamentally flawed and should not be used as the basis for concluding that issues have previously been examined. This concern applies to the proposed TBIT reconfiguration project.
2. **Safety and Security:** There is no indication the EIR will analyze airport safety or security issues within LAX, much less for neighborhoods surrounding LAX as requested in our earlier comments letters.
3. **Transportation:** As noted above, the NOP states the traffic assessment will consider changes to on-airport and off-airport vehicle traffic that are attributable to the proposed project. However, the main focus of the traffic analysis is clearly

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on construction-related impacts. The NOP provides no elaboration concerning off-airport traffic impacts and it is almost certain that the analysis will not consider concerns raised in the County's March 2008 and previous comments letters including:

- a) Analyze all vehicle trips on all traffic lanes at key intersections utilized to access the airport with conversion of truck trips to Passenger Car Equivalents (PCE) and clear identification of the criteria used to predict the increase in annual passengers at LAX;
 - b) Review the relationship between the Lennox interchange (if it is still proposed as a mitigation measure) and the circulation system east and west of I-405;
 - c) The need for a complete inventory of available parking spaces (airport owned and off-airport) and identification of future vehicle parking areas to accommodate additional air passenger demands through build-out; and
 - d) Consultation with affected local jurisdictions regarding potential traffic impacts, consideration of additional intersection and roadways identified by the Petitioners, and feasible mitigation measures to off-set potentially significant impacts.
4. **Land Use Planning:** The NOP makes no reference to land use as a topic in the forthcoming EIR, nor does it reference the concern that the Airport Land Use Commission has found the LAX Master Plan inconsistent with the County Land Use Plan.
 5. **Capacity Limitations:** The NOP states in several places that the proposed reconfiguration will modify the number and location of gates serving TBIT. However, it is not entirely clear from the discussion or the graphics exactly how many gates will be added or eliminated (it appears that perhaps 10 gates will be added and 12 removed.) Generally, the NOP does not discuss the relationship the TBIT gates represent with the overall number of gates at LAX which LAWA has committed to limiting under the terms of the Settlement Agreement. Nowhere does the NOP suggest that the forth coming EIR will analyze passenger service levels or growth projections despite the long history of County comments requesting that such analyses be provided.
 6. **Strategic Regionalization:** The NOP does not mention LAWA's obligation, under the Settlement Agreement, to spearhead efforts to achieve a regional distribution of air traffic demand.

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7. **Environmental Justice:** This project proposal carries potential indirect and cumulative impacts on environmental justice due to increased noise from aircraft overflights and vehicle traffic, as well as increased traffic congestion, associated impacts on air quality, increased health risks, and would, therefore, have the potential to disproportionately impact minority population in the neighborhoods located immediately east of the airport. As such, an analysis of environmental justice issues should be included in the EIR.

Thank you for this opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. T. Fujioaka', with a stylized flourish at the end.

WILLIAM T FUJIOKA
Chief Executive Officer

WTF:ES:MKZ
FC:JR:pg

c: Each Supervisor
County Counsel
Director of Public Works
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